

1 DANIEL G. BOGDEN
2 United States Attorney
District of Nevada

3 BLAINE T. WELSH
4 Assistant United States Attorney
Nevada Bar No. 4790
5 333 Las Vegas Blvd. South, Suite 5000
Las Vegas, Nevada 89101
Tel: (702) 388-6336
Fax: (702) 388-6787
Email: Blaine.Welsh@usdoj.gov

7 Attorneys for Defendant

9

10

11

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 ZANE E. GOODFIELD,

)

15 Plaintiff,

)

16 v.

)

17 CAROLYN W. COLVIN,

Case No.: 2:13-cv-01331-GMN-VCF

Acting Commissioner of Social Security,

)

18 Defendant.

)

19 _____)

20 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
(Third Request)

22 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), requests
23 that this Court extend the time to respond to Plaintiff's Motion for Reversal and/or Remand fourteen
24 (14) days, until March 5, 2014. This is Defendant's third request for an extension of time. Plaintiff's
25 counsel was contacted on February 18, 2014, and indicated that Plaintiff does not oppose the requested
26 extension. Defendant's current deadline is February 19, 2014.

1 Defendant does not intend to unnecessarily delay this matter, but this request is necessary for
2 two reasons. In early February, the current agency counsel took this matter over from the previous
3 attorney, SSA OGC Assistant Regional Counsel Brenda Pullin upon her medical emergency, which
4 was more serious than expected. Upon reviewing the case, current agency counsel sought further
5 coordination with her client. Counsel anticipated a definitive response from her client by Monday,
6 February 18, 2014. However, the client is located in Falls Church, Virginia and its offices were
7 unexpectedly closed during the week of February 10 – 14, 2014, due to inclement weather. The
8 unexpected delay prohibits Defendant from responding to Plaintiff until March 5, 2014.

9 For this reason, the parties request that Defendant be granted an additional fourteen (14) days
10 to respond to Plaintiff's motion, up to and including March 5, 2014, with other deadlines extended
11 accordingly.

Respectfully submitted this 19th day of February 2014.

DANIEL G. BOGDEN
United States Attorney

/s/ Blaine T. Welsh
BLAINE T. WELSH
Assistant United States Attorney

17 | OF COUNSEL:

18 | DONNA L. CALVERT
Acting Regional Chief Counsel

ELIZABETH FIRER
Assistant Regional Counsel
Social Security Administration

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE

DATED: 2-21-2014

CERTIFICATE OF SERVICE

I, Blaine T. Welsh, certify that the following individual were served with a copy of the
UNOPPOSED MOTION FOR EXTENSION OF TIME on the date, and via the method of service
identified below:

Electronic Case Filing:

Marc V Kalagian
Rohlfing & Kalagian, LLP
211 E. Ocean Blvd. Suite 420
Long Beach, California 90802
Marc.Kalagian@rksslaw.com

Leonard Stone
Shook & Stone, Chtd.
710 South Fourth Street
Las Vegas, Nevada 89101
kshonfeld@shookandstone.com

Attorneys for Plaintiff

Dated this 19th day of February 2014

/s/ Blaine T. Welsh
BLAINE T. WELSH
Assistant United States Attorney